



MEMO ENDORSED

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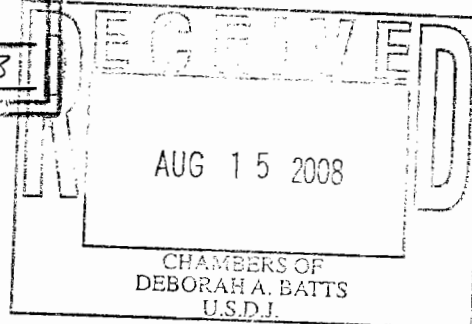
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August 14, 2008

BY HAND DELIVERY

The Honorable Deborah A. Batts
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 2510
New York, New York 10007



Re: Metro-Goldwyn-Mayer Studios Inc. v. TPS Gestion, S.A., TPS Societe en Nom Collectif, Canal+ France S.A. and Groupe Canal+ S.A., 07 Civ. 2918 (DAB)

Dear Judge Batts:

We are counsel for plaintiff Metro-Goldwyn-Mayer Studios Inc. ("MGM"), and write to follow up our prior letter to the Court of July 10, 2008 (copy enclosed). In light of the changes in Defendants' corporate structures, MGM wishes to file a First Amended and Supplemental Complaint that reflects those changes. A copy of the proposed pleading is also enclosed. We provided a copy of the proposed pleading to counsel of record for defendants, Lauren Reiter Brody of Manatt, Phelps & Phillips, and requested that defendants consent to its filing. We have received an e-mail response from Ms. Brody stating that defendants refuse to give that consent.

Under the Court's Individual Rules, MGM must request a pre-motion conference before moving for leave to file the proposed First Amended and Supplemental Complaint. We therefore request that the Court schedule such a conference. I am available for an in-court conference at any time convenient to the Court except for September 10-19, when I will be absent from New York. I can participate in a telephone conference at any time convenient to the Court.

Respectfully yours,

Andrew Deutsch
Andrew L. Deutsch

ALD/jr
Enclosures

cc: Lauren Reiter Brody, Esq. (attorney for defendants)

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*Motion to file Amended
Complaint granted.
SO ORDERED*

Deborah A. Batts
DEBORAH A. BATTS 8/20/08
UNITED STATES DISTRICT JUDGE

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